

Comments of The Humane Society of the United States
In response to the Federal Register announcement published on June 5, 2009
Docket Number EPA-HQ-OPP-2009-0308
Tetrachlorvinphos (TCVP)
Submitted August 3, 2009

These comments are being submitted on behalf of The Humane Society of the United States (HSUS) and our more than eleven million members and constituents. We thank the EPA for the opportunity to comment on this dangerous chemical as it is used in flea and tick products.

The HSUS recognizes the need to control fleas and ticks living on companion animals (dogs and cats) for both the welfare of these species but also for the welfare of human beings. Ensuring that the public has easy and economical access to products which will reduce or eliminate these ectoparasites is crucial to improving the quality of life for companion animals and their owners.

Our concerns relate to the adverse reactions caused by chemicals in flea and tick products. Over the past decade, the HSUS has received hundreds of complaints regarding severe reactions and even death of companion animals caused by many flea and tick products. These pet owners are outraged by the lack of proof that these chemicals are safe. After losing their beloved pets and incurring enormous veterinary expenses trying to save their lives, these pet owners feel betrayed and confused.

Despite an agreement between the Hartz Mountain Corporation and The EPA, The HSUS continues to receive complaints regarding Hartz flea and tick products more than any other manufacturer. This is not surprising as the EPA's list of registered pet products containing organophosphate insecticides, which appears on the Natural Resources Defense Council's website, shows that nearly all of the products listed under TCVP are manufactured by Hartz.

Even though Hartz has agreed not to sell certain products and to improve their labeling of others, The HSUS continues to receive complaints. Anecdotally, we were recently contacted by a constituent in Minnesota who had administered Hartz Flea Drops to her cat. The cat became lethargic and refused to eat. A visit to a veterinarian, who administered fluids and antibiotics, did not help his symptoms. Only after realizing that the time of the cat's illness coincided with the application of the flea treatment did the owner realize what caused the cat's decline. Unfortunately, the veterinarian did not question the owner if there had been a recent flea/tick treatment. The owner is pursuing further treatment for her cat, at her own expense, but larger questions remain about the safety of these products.

We urge you to ban Tetrachlorvinphos completely for use in animals. It has likely caused significant harm to countless companion animals and their families and its safety in humans cannot be substantiated. The HSUS supports the ban of all organophosphates for

use in pet products and will steer pet owners away from these chemicals and the companies which manufacture products containing them. Instead, we will encourage use of products which work to inhibit the growth of fleas and support flea treatment of the living environments of animals, rather than advising that chemicals be applied directly to animals.